

REMARKS

This is a response to the Office Action dated June 14, 2005. Claims 28-33 are pending in the application.

In the Office Action, the Examiner rejected claims 28-33 under 35 U.S.C. § 103(a) as being unpatentable over WO 97/13086 ("Muderlak") in view of U.S. Pat. No. 2,552,625 ("Filiung, Jr."). Further, claims 28-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Muderlak in view of U.S. Patent No. 6,643,853 ("Wilson"). Further, claims 28-33 were rejected under 35 U.S.C. § 103(a) as unpatentable over Wilson in view of Muderlak. Finally, claims 28-33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Filiung, Jr. in view of Muderlak.

Multiple 103(a) rejections were issued for the same combination of references. Applicant treats the different combinations of rejections as a single rejection. The examiner made a 103(a) rejection based on Muderlak in view of Filiung, Jr., and a separate 103(a) rejection based on Filiung, Jr. in view of Muderlak. These two rejections are functionally identical and have been treated as one rejection.

In addition, the examiner made a 103(a) rejection based on Muderlak in view of Wilson, along with a separate 103(a) rejection based on Wilson in view of Muderlak. These two rejections are functionally identical and have been treated as one rejection.

Each of the rejections from the Office Action of June 14, 2005 is discussed below in connection with the various claims. Reconsideration is respectfully requested in light of the following remarks.

I. 35 U.S.C. §103(a) – Muderlak in view of Filiung, Jr.; and Filiung, Jr. in view of Muderlak

The Examiner admits Muderlak does not disclose an actuator and motor "mounted on a movable plate within an enclosure" as claimed in independent claims 28 and 31. In addition, Filiung Jr. also does not disclose an actuator and motor "mounted on a movable plate within an enclosure." Instead, Filiung Jr. discloses motor frame members 20 and 21 clamped at one end to a motor by rivets 25 and 26. (Filiung Jr., Col. 3 Lines 68-72.) The motor frame members 20 and 21 are rigidly secured at the

opposite end to a bracket 19. (Filiung Jr., Col. 3 Lines 52-61.) Filiung Jr. does not teach or suggest a motor “mounted on a movable plate within an enclosure” as claimed. Hence, Muderlak and Filiung Jr., alone or in combination, fail to disclose the claimed invention.

II. 35 U.S.C. §103(a) - Muderlak in view of Wilson; and Wilson in view of Muderlak

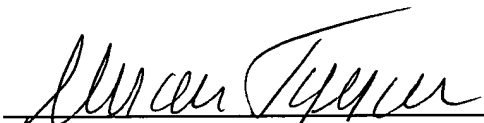
As noted above, the Examiner admits Muderlak does not disclose an actuator and motor “mounted on a movable plate within an enclosure” as claimed in independent claims 28 and 31. In addition, Wilson fails to disclose an actuator and motor “mounted on a movable plate within an enclosure.” Instead, Wilson discloses a “motor drive handle interface 40 ... mounted on ... pins 34 for movement about the handle axis 22.” (Wilson, Col. 2, Lines 65-67.) The interface 40 “includes a U-shaped cradle 42 which ... upon pivotal movement of the interface, will cause pivotal movement of the handle 16.” (Wilson, Col. 2 Line 67 – Col. 3 Line 4.) Wilson teaches that “[e]xtending downwardly from the cradle 42 is an arm 44 which will cooperate with the drive motor assembly 46 to cause pivotal movement of the handle interface.” (Wilson, Col. 3, Lines 5-7.) In particular, Wilson discloses that the motor drive assembly 46 includes “a drive motor 50 mounted on a drive train 52, the last stage of which is indicated by the gear 54 having a pin 56. The pin 56 will ride in the slot 58 in the handle interface whereby rotation of the gear 54 and the pin 56 will cause **pivotal movement of the handle interface** to operate the handle 16.” (emphasis added) (Wilson, Col. 3, Lines 15-20.) The motor drive assembly 46 itself is mounted to the housing 26. (Wilson, Col. 3, Lines 14-15.) Therefore, none of the references teach or suggest an actuator and motor “mounted on a movable plate within an enclosure” as claimed. Hence, Muderlak and Wilson, alone or in combination, fail to disclose the claimed invention.

III. Conclusion

For the reasons set forth above, the Applicants respectfully submit that the pending claims are allowable. The Examiner is invited to contact the undersigned attorneys for the Applicant via telephone if the Examiner has any questions, comments,

or concerns, or if a telephone conference would expedite examination of this application.

Respectfully submitted,



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